ENVIRONMENTAL LIABILITY MANAGEMENT, INC.

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October 4, 2005

-- Via Federal Express --

Mr. Alan J. Steinberg
Regional Administrator
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

RE: BASF Corporation, 50 Central Avenue, Kearny, New Jersey
Notification of Self-Implementing PCB Cleanup

Dear Mr. Steinberg:

Pursuant to 40 CFR 761.61 (a), the BASF Corporation (BASF) is notifying the United States Environmental Protection Agency (USEPA) that it intends to conduct a self-implementing cleanup of polychlorinated biphenyls (PCBs) at its Kearny, New Jersey, property (Figure 1). BASF intends to conduct this self-implementing cleanup within 30 days of submission of this self-notification or upon receipt of USEPA approval of this notification.

APPLICATION SUMMARY

BASF has been performing investigation and remedial action under the oversight of the New Jersey Department of Environmental Protection (NJDEP) pursuant to the Industrial Site Recovery Act (ISRA) at its Kearny, New Jersey, property since 1990, when BASF ceased operations at the site. During this period, several phases of investigation have been conducted, and BASF has treated approximately 40,000 cubic yards (yd^3) of soil containing PCBs at concentrations less than 50 mg/kg and phthalates (primarily bis-2-ethyl hexyl phthalate, BEHP) using an aqueous soil washing system. The treatment system has achieved the remedial objective of the NJDEP Non-Residential Direct Contact Soil Cleanup Criteria (NRDCSCC) for each constituent, 2 mg/kg for PCBs and 210 mg/kg for BEHP.

Remaining on the site are two relatively small areas, totaling approximately 2,000 square feet (ft^2), located along the inaccessible waterfront portion of the 27-acre Kearny property, in which PCBs are present in soil at concentrations greater than 50 mg/kg (Figures 2 and 3). An investigation of these areas was conducted in November and December 2004 pursuant to 40 CFR 761.289. The investigation found PCBs ranging in concentration from slightly above 50 mg/kg to 100 mg/kg, with the highest concentrations found in the 2'-4' soil interval.

BASF is proposing to remove all soil located above the water table (approximately 4 feet in depth) in these two areas and dispose it at an approved PCB disposal facility. Residual PCB

concentrations will range from approximately 50 mg/kg to approximately 60 mg/kg. After the soil is removed, the excavation will be filled with clean, compacted soil. The four feet of clean soil exceeds the requirements for a cap specified in 40 CFR 761.61 (a)(7). A Deed Notice will be established for the entire site.

The site is undergoing redevelopment as a warehousing facility. The areas that will be addressed pursuant to this notification are outside of the development planned for the site, and there will be no occupancy of these two areas following the remedial action. Therefore, the areas are appropriately characterized as low occupancy. The remaining PCB concentrations will be less than the 100 mg/kg allowed by 40 CFR 761.61 (a)(4) for low-occupancy areas covered by a cap.

Post-remediation monitoring and operation and maintenance (O&M) will be performed by BASF to ensure that the remedial action was successful and that the engineering control retains its integrity. BASF has recently completed installation of thirteen ground water monitoring wells that will serve as the post-remediation monitoring network for the site. Additionally, as per NJDEP regulation, the engineering controls installed on the site will be inspected biannually, and the results will be submitted to NJDEP.

BACKGROUND

The BASF Kearny property is approximately 27 acres in size and is located at 50 Central Avenue in Kearney, New Jersey. The site is located on a point at the northern terminus of Newark Bay, in a heavily industrialized area near the confluence of the Passaic and Hackensack Rivers. The Passaic River is adjacent to the western side of the site. The northern and eastern boundaries are adjacent to industrial facilities and a sanitary wastewater pump station, respectively. The topography of the site is flat with the ground surface elevation ranging from 6 to 10 feet above mean sea level (MSL). Depth to ground water is approximately four feet.

The site is currently undergoing remedial action under the oversight of the New Jersey Department of Environmental Protection (NJDEP) pursuant to the Industrial Site Reclamation Act (ISRA). The site entered the ISRA program in 1990, when BASF terminated operations. All former buildings and structures have been removed from the site, and the property is now vacant except for a soil treatment system and a project site trailer.

Currently, the property is scheduled for redevelopment as a warehouse and distribution center, consistent with the land use surrounding the site. BASF will transfer the property but retain responsibility for completing its remedial action requirements pursuant to ISRA.

Site Characterization and Remedial Action

Numerous investigations of the property have been conducted. These investigations have found that the primary constituents of concern (COCs) at the site are phthalates (primarily bis-ethyl hexyl phthalate, BEHP) and polychlorinated biphenyls (PCBs). Metals and polynuclear aromatic hydrocarbons (PAHs) are also present in some locations as a result of historic filling activities. BASF submitted to NJDEP a Remedial Action Work plan (RAW; Dames and Moore, 1998) and

a Remedial Action Workplan Addendum (RAWA; URS, 2000) documenting the characterization of the site and proposing a remedy for soils. The NJDEP-approved a remedy for soil consisting of three primary components:

1. Excavation and *ex-situ* treatment of approximately 38,000 cubic yards (yd^3) of soil,
2. Installation of engineering controls across the site, and
3. Establishment of institutional controls in the form of a Deed Notice.

The treatment process selected by BASF was an aqueous-based soil washing technology. All treated soil was required to achieve the NJDEP Non-Residential Direct Contact Soil Cleanup Criteria (NRDCSCC), 2.0 milligrams per kilogram (mg/kg) and 210 mg/kg for PCBs and BEHP, respectively. BASF conducted a rigorous pre- and post-treatment sampling program to confirm that these criteria were achieved.

The engineering controls have been incorporated into the final design for the site redevelopment. Two to four feet of compacted clean fill will be placed across the site, and buildings, roadways, parking areas and other structures will be placed on top of the compacted soil.

As per the Technical Requirements for Site Remediation (TRSR; NJAC 7:26E, *et seq.*) and 40 CFR 761.61 (a)(8), a Deed Notice will be established for all areas of the property where the engineering controls are installed. These will include the entire property, since the NRDCSCC was the chosen remedial action objective, and the two subject areas will be incorporated into the Deed Notice.

Soils Containing PCBs at Concentrations $\geq$ 50 mg/kg

Notification of Self-Implementation

The majority of the soil washing, consisting of approximately 32,000 yd^3 of soil, was completed by September 2004. At this time, approximately 2,000 cy of soil, presumed by BASF to contain PCBs at concentrations greater than 50 mg/kg, and therefore subject to the Toxic Substance Control Act (TSCA) and regulation by the USEPA, remained to be treated. BASF provided to the USEPA a Self-Implementation Notification pursuant to 40 CFR 761.61(a)(3) for the remaining soil (ELM, 2004a). The Self Implementation Notification proposed treatment of the soil using the aqueous-based soil washing technology that had successfully treated the non-TSCA soil.

The USEPA rejected BASF's proposal to treat the soil that was subject to regulation under TSCA (USEPA, 2004). Among other items, the USEPA cited a concern that dilution may be a primary mechanism by which reductions in PCB concentrations in soil were being achieved. In an attempt to address this concern, BASF conducted further characterization of the locations in which PCBs were presumed to be present at concentrations greater than 50 mg/kg.

Supplemental Investigation

BASF conducted two phases of supplemental investigation. The first phase of investigation was conducted from November 1-3, 2004, and the second was conducted on November 18, 2004. The first phase provided an initial characterization of the two areas, and the second phase completed the delineation of the discrete areas where PCBs were present at concentrations greater than 50 mg/kg. Both phases were conducted pursuant to Subpart N, 40CFR 761.265(a).

During the first phase, a 3-meter (m) by 3 m grid was created across the two areas previously identified as possibly containing PCBs in soil at concentrations greater than 50 mg/kg (Figures 3 and 4). As per 40 CFR 283(b)(3), soil borings were installed at each point where the grid lines intersected, and samples were collected from the 0'-2' and 2'-4' intervals at each location where the grid lines intersect.

As per 40 CFR 761.289 (b)(1)(i), samples from the same depth intervals from the corners of each 3m x 3m grid were composited into a single sample and analyzed by STL Laboratories of Edison, New Jersey, by EPA Method 8082. A total of 100 borings were installed, and 63 samples from each depth interval were analyzed.

The objective of the second phase of the supplemental investigation was to complete the horizontal and vertical bounding of soil containing PCBs at concentrations greater than 50 mg/kg. To accomplish the objective of horizontally bounding the area, the sampling grid in each area was extended beyond the boundaries of the TSCA areas, if accessible, and samples were collected and composited in the same manner as in the first phase. Vertical bounding was accomplished by collecting deeper samples from beneath the grid location in one or more representative area(s), typically in a location where the highest PCB concentrations had been detected.

The results of the supplemental investigation provide a very precise bounding of the individual 3 m x 3 m x 2 ft soil volumes in which PCBs are present at concentrations greater than 50 mg/kg. As presented in Table 1 and on Figures 2 and 3, PCBs are present at concentrations greater than 50 mg/kg in only four grid locations in the TSCA East area, and eight of the grid areas in the TSCA West area. The PCBs may extend to a depth of 10 feet in the TSCA East area and eight feet in the TSCA West area.

The highest concentrations of PCBs were found in the 2'-4' interval, immediately above the water table. These concentrations ranged from 55.5 mg/kg to 100 mg/kg. PCB concentrations declined with depth; at grid 1 in the TSCA East area, PCB concentrations were 100 mg/kg at the 2'-4' interval and 50.8mg/kg and 58.8 mg/kg at the 4'-6' and 6'-8' intervals, respectively. PCB concentrations were 1 mg/kg at the 8'-10' interval in this same location.

Current Status of Remedial Action Implementation

With the exception of the approximately 300 cy of soil containing PCBs at concentrations greater than 50 mg/kg and a small amount of soil located in the TSCA-regulated areas but inaccessible

until the TSCA soil is removed, all soil located on the BASF site containing either phthalates or PCBs at concentrations greater than the NRDCSCC has been treated. BASF has reached an agreement with the property redeveloper, and the conceptual design of the engineering controls has been completed. The post-remediation monitoring wells, as required by the NJDEP, were installed in the middle of September 2005, and monitoring will begin in the near future. Finally, BASF is completing off-property delineation onto Town of Kearny property, located to the southeast of the BASF property.

REMEDY SELECTION AND DESCRIPTION

BASF has elected to perform a self-implementing remediation of the soils containing PCBs at concentrations greater than 50 mg/kg. BASF will remove all of the soil above the water table, approximately 0'-4', and dispose the soil in an approved off-site disposal facility. Approximately 300 yd^3 of soil will be excavated and disposed. The area will then be backfilled with four feet of clean compacted soil, meeting the requirements of 40 CFR 761.61 (a)(7) for a cap.

The two areas are located outside the area that will be developed; therefore, there will be no occupancy of the areas, and they can appropriately be designated low occupancy. The remaining PCB concentrations in soil will be less than 100 mg/kg, the level allowed by 40 CFR 761.61 (a)(4) for low occupancy areas covered by a cap.

New Jersey Department of Environmental Protection regulation requires that a Deed Notice be established for portions of any property where constituents are to be left in place at a concentration exceeding the Residential Direct Contact SCC. The NJDEP has developed a Model Deed Notice and requires that the specified language be used. The Model Deed Notice includes information regarding the vertical and horizontal distribution of all constituents present above the RDCSCC, restrictions on the land use of the property, notice requirements prior to any disturbance of the property (such as for utility installation or repair), and an operation and maintenance plan for any engineering controls that may be in place, among other items. The Model Deed Notice will be used, with the required attachments, as the deed notice for the Kearny property.

New Jersey Department of Environmental Protection regulation also requires the biennial inspection of all engineering controls. These biennial inspections must be performed by a qualified individual, and the results must be submitted to the NJDEP. The inspections are required to identify any areas where the integrity of the cap has failed and to recommend any repairs that may be needed. The inspections will also determine if there have been any changes in land use that would require modifications to the institutional controls. These biennial inspections will be conducted at the Kearny site, and the two areas where PCBs are present at concentrations exceeding 50 mg/kg will be included.

As part of the approved remedy for the site, NJDEP is requiring the installation of a post-remediation monitoring well network. Fourteen (14) monitoring wells have been installed in the locations presented in Figure 4. The wells will be sampled and the samples will be analyzed for

site-related constituents, including PCBs. If additional actions are needed to address any constituent in ground water, NJDEP is authorized to require these actions be performed.

In summary, the proposed self-implementing cleanup complies with the requirements of 40 CFR 761.61 (a). The soil containing the highest concentrations of PCBs will be removed, and the residual PCB concentrations will be less than the levels allowed for low occupancy areas covered with a cap by 40 CFR 761.61 (a)(4). No occupancy of the areas will occur; therefore, the areas are appropriately designated as "low-occupancy". All residual PCBs will be effectively contained beneath a cap exceeding the specifications of 40 CFR 761.61 (a)(7). The Deed Notice will identify precisely where the soil containing the PCBs is located and will specify procedures that must be followed in the event that any subsurface soil is disturbed. A ground water monitoring program will be implemented to ensure that no constituents, not just PCBs, in ground water pose a risk to public health or the environment, and if any constituent is found to represent a risk, New Jersey statute and regulation will require BASF to take actions to address those risks.

BASF wishes to complete the remedial action for on-site soils at the Kearny site and is requesting approval of this notification. If you have any questions, please call Mr. Doug Reid-Green of BASF at (908) 806-6472 or Hank Martin of ELM at (973) 263-5820.

Sincerely,

ENVIRONMENTAL LIABILITY MANAGEMENT, INC.

Hank Martin
Principal

HM:gah

Enclosures: References
Table 1: Summary of PCB Investigation Results, TSCA East and West Areas
Figure 1: Site Location Map
Figure 2: Grid Locations and Composite Sample Results for TSCA East Area
Figure 3: Grid Locations and Composite Sample Results for TSCA West Area
Figure 4: Monitoring Well Locations - Post Soil Remediation

c: Doug Reid-Green, BASF Corporation
Daniel Kraft, Chief, USEPA Region 2 Toxics Section

REFERENCES

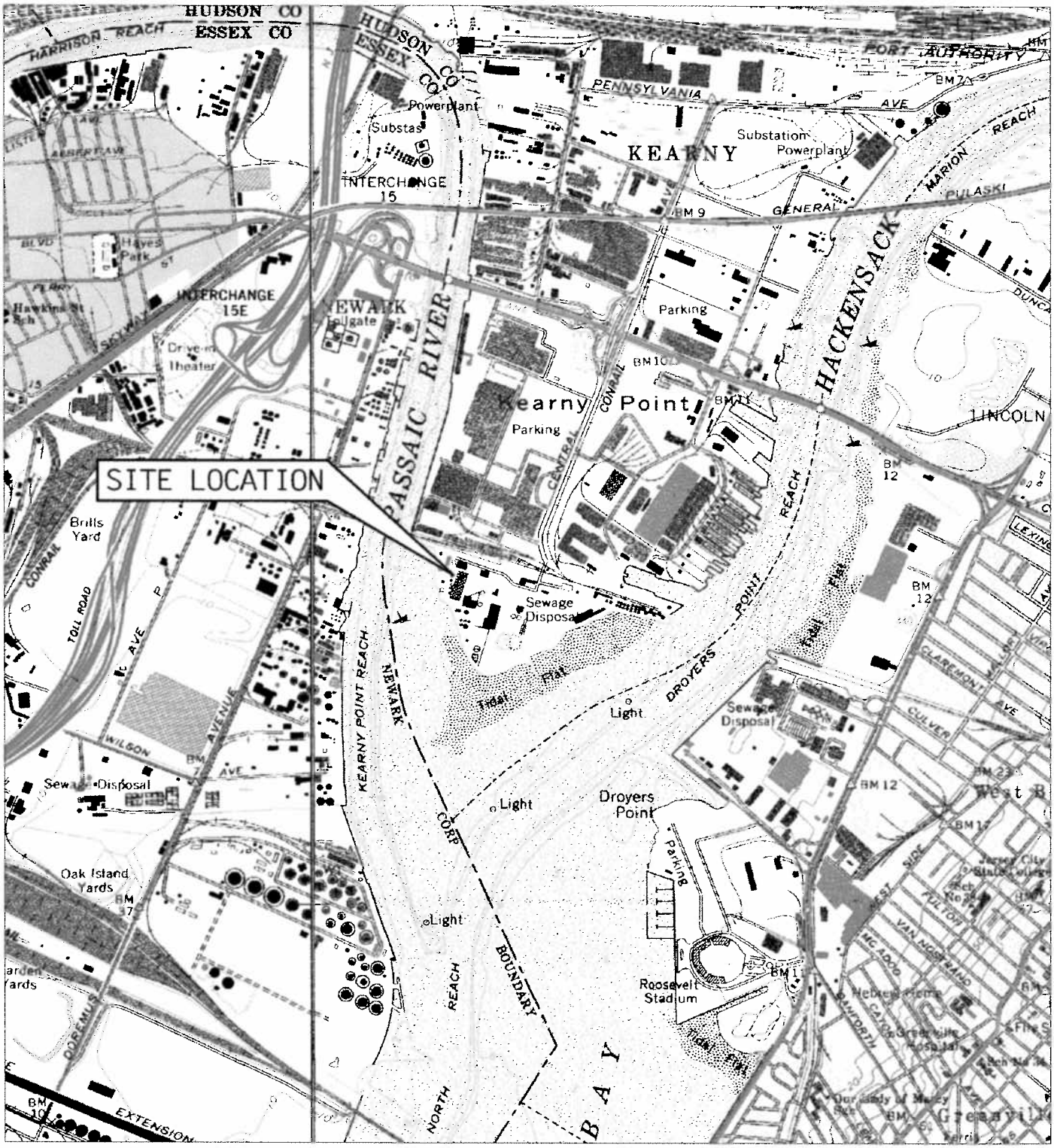
Dames and Moore. 1998. Remedial Action Work Plan for BASF Corporation's Kearny, New Jersey Facility. October 1998.

ELM. 2004a. PCB Self-Implementation Remedial Action Notification to the USEPA. Letter from Hank Martin of ELM to Jane M. Kenney, USEPA Region II Administrator. September 1, 2004.

ELM. 2004b. Supplemental Information for September 1, 2004 Self-Implementation Notification to the USEPA. Letter from Hank Martin of ELM to Dennis McChesney of USEPA Pesticides and Toxic Substances Branch. September 21, 2004.

URS. 2000. Remedial Action Workplan Addendum for BASF Corporation's Kearny, New Jersey Facility, ISRA Case No. 90537. November 2000.

USEPA. 2004. Response to Notification, Letter from Kenneth S. Stoller, USEPA Pesticides and Toxic Substances Branch Chief, to Hank Martin of ELM. September 23, 2004.



0 2,000 4,000

SCALE: 1" = 2,000'

TITLE:	FIGURE 1 SITE LOCATION MAP
LOCATION:	BLOCK 288, LOTS 1,2,3, & 3R BASF CORPORATION 50 CENTRAL AVENUE, KEARNY TOWN, HUDSON COUNTY, NEW JERSEY
DATE:	05/21/04
FILENAME:	200236_SITELOC
SOURCE:	USGS TOPO, JERSEY CITY, N.J. QUAD. USGS TOPO, ELIZABETH, N.J. QUAD.

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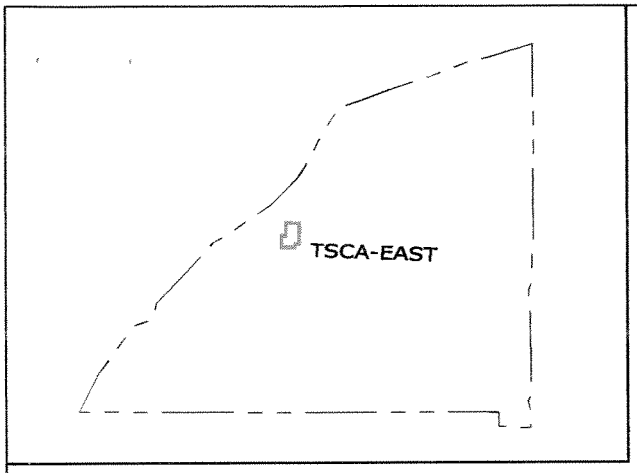
1259 Route 46 East, Building 1, First Floor, Parsippany, NJ 07054



	55 (NT) (9.2)	
49 (NT) (8.2)	50 (NT) **(67)**	51 (NT) (33)
44 (NT) (7.8)	43 (NT) **(61.9)**	42 (NT) (10.6)
35 (NT) (34)	36 (NT) **(57)**	37 (NT) (41)
3 (18.5) (32.2)	2 (28.1) **(87)**	1 (6.65) **(100)** **(50.8)** **(58.8)** (1)
7 (13.7) (18)	6 (12.5) (29)	5 (30) (32.4)

		38 (NT) (38)

LEGEND

— — — —	APPROXIMATE PROPERTY LINE
12 (2.97) (15) (NT) (NT) (NT)	GRID SAMPLE LOCATION AND ID 0-2' PCB RESULT IN mg/kg 2-4' PCB RESULT IN mg/kg 4-6' PCB RESULT IN mg/kg 6-8' PCB RESULT IN mg/kg 8-10' PCB RESULT IN mg/kg
NT	NOT TESTED

NOTE:

1) GRID SAMPLES WERE COMPRISED FROM EACH CORNER OF THE RESPECTIVE GRID LOCATION.

2) BOLD RESULTS/SHADED AREAS EXCEED TSCA PCB LEVEL OF 50 mg/kg.

0 10 20

SCALE: 1" = 10

TITLE:

FIGURE 2
GRID LOCATIONS AND COMPOSITE SAMPLE RESULTS FOR TSCA EAST AREA

LOCATION:
BASF CORPORATION
KEARNY,
NEW JERSEY

DATE: 10/03/05

FILENAME: 200236_SOILPCBINV

LAYOUT: TSCA-EAST2

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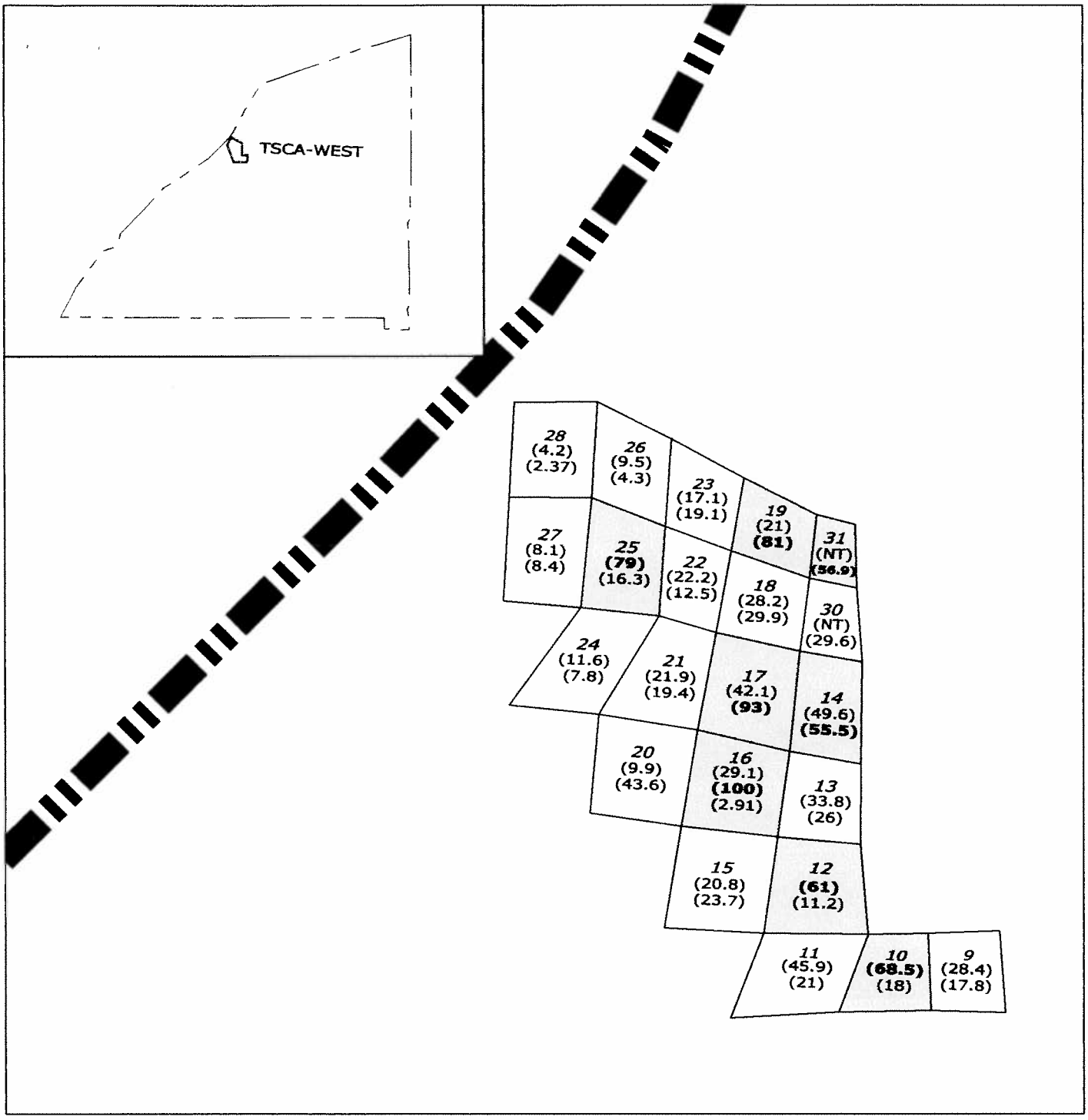

LEGEND

— — — —	APPROXIMATE PROPERTY LINE
12 (2.97) (15) (NT) (NT) (NT)	GRID SAMPLE LOCATION AND ID 0-2' PCB RESULT IN mg/kg 2-4' PCB RESULT IN mg/kg 4-6' PCB RESULT IN mg/kg 6-8' PCB RESULT IN mg/kg 8-10' PCB RESULT IN mg/kg
NT	NOT TESTED

NOTE:

1) GRID SAMPLES WERE COMPRISED FROM EACH CORNER OF THE RESPECTIVE GRID LOCATION.

2) BOLD RESULTS/SHADED AREAS EXCEED TSCA PCB LEVEL OF 50 mg/kg.

0 20 40

SCALE: 1" = 20

TITLE:

FIGURE 3
GRID LOCATIONS AND COMPOSITE SAMPLE RESULTS FOR TSCA WEST AREA

LOCATION: BASF CORPORATION, KEARNY, NEW JERSEY

DATE: 10/03/05

FILENAME: 200236_SOILPCBINV

LAYOUT: TSCA-WEST2

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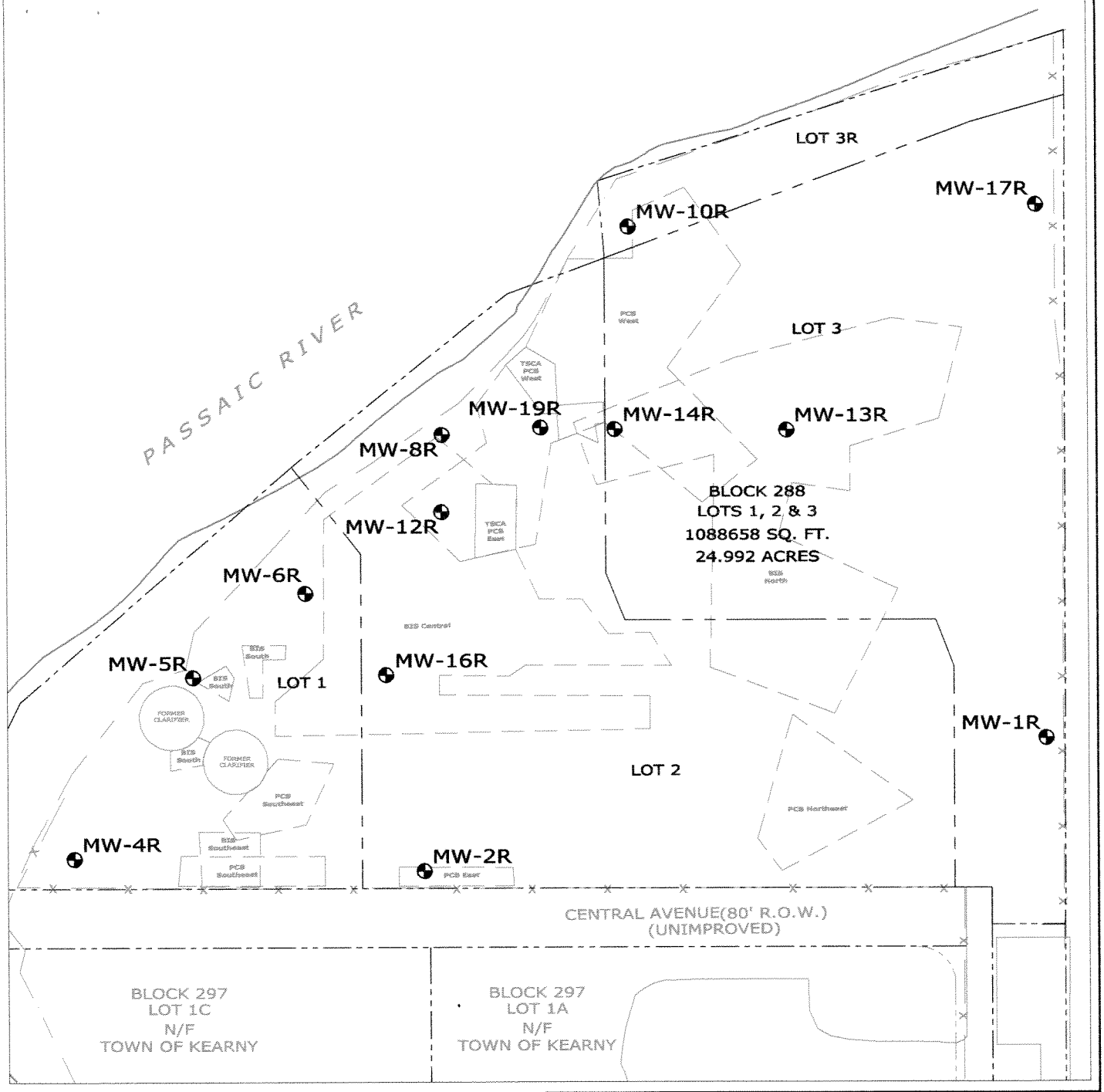

LEGEND

- MW-1R — MONITORING WELL LOCATION AND ID
- PROPERTY LINE
- FENCE
- RIVER BANK
- 2002 SOIL AOCs / SOIL WASHING TREATMENT AREAS

SOURCE:

1. LOCATION OF MONITORING WELLS BASED ON DAMES & MOORE FIGURE 1-2A GROUNDWATER ANALYTICAL RESULTS EXCEEDING NJDEP'S GQS - JUNE 1997, REMEDIAL ACTION WORKPLAN, OCTOBER 1998

0 200 400

SCALE: 1" = 200'

TITLE:

FIGURE 4
MONITORING WELL LOCATIONS - POST SOIL REMEDIATION

LOCATION:	BASF CORPORATION KEARNY, NEW JERSEY
DATE:	10/3/05/05
FILENAME:	200236_MW
LAYOUT:	MW-LOCATION

ENVIRONMENTAL LIABILITY MANAGEMENT, INC.
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Table 1
Summary of PCB Investigation Results
TSCA East and West Areas
BASF Corporation
Kearny, New Jersey

TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample ID				TEGRID-1-0	TEGRID-1-2	TEGRID-1-4	TEGRID-1-6	TEGRID-1-8	TEGRID-2-0	TEGRID-2-2
Laboratory ID				597274	597275	585889	585900	588389	597276	597277
Sample Date				11/01/04	11/01/04	11/18/04	11/18/04	11/30/04	11/01/04	11/01/04
Sample Depth (ft bgs)				0.0-2.0	2.0-4.0	4.0-6.0	6.0-8.0	8.0-10.0	0.0-2.0	2.0-4.0
Matrix				SOIL	SOIL	SOLID	SOLID	SOLID	SOIL	SOIL
Dilution Factor				20	500	50	50	1	100	500
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	6.65	**100**	**50.8**	**58.8**	1	28.1	**87**
Aroclor-1016	NS	NS	NS	0.51 U	10 U	3.9 U	4.1 U	0.098 U	1.9 U	10 U
Aroclor-1221	NS	NS	NS	0.51 U	10 U	3.9 U	4.1 U	0.098 U	1.9 U	10 U
Aroclor-1232	NS	NS	NS	0.51 U	10 U	3.9 U	4.1 U	0.098 U	1.9 U	10 U
Aroclor-1242	NS	NS	NS	5.8	100	46	54	1	25	87
Aroclor-1248	NS	NS	NS	0.51 U	10 U	3.9 U	4.1 U	0.098 U	1.9 U	10 U
Aroclor-1254	NS	NS	NS	0.51 U	10 U	3.9 U	4.1 U	0.098 U	1.9 U	10 U
Aroclor-1260	NS	NS	NS	0.85	10 U	4.8	4.8	0.098 U	3.1	10 U
Aroclor-1262	NS	NS	NS	NA	NA	3.9 U	4.1 U	0.098 U	NA	NA
Aroclor-1268	NS	NS	NS	NA	NA	3.9 U	4.1 U	0.098 U	NA	NA

Notes:
NS - No NJDEP SCC for Individual PCB Aroclors
NA - Not Analyzed
U - Not Detected Above Minimum Detection Limit
P - Greater than 25% difference for detected concentrations between two GC columns.

Table 1
Summary of PCB Investigation Results
TSCA East and West Areas
BASF Corporation
Kearny, New Jersey

TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample ID				TEGRID-3-0	TEGRID-3-2	TEGRID-5-0	TEGRID-5-2	TEGRID-6-0	TEGRID-6-2	TEGRID-7-0
Laboratory ID				597278	585890	597281	597282	597283	597284	597285
Sample Date				11/01/04	11/18/04	11/01/04	11/01/04	11/01/04	11/01/04	11/01/04
Sample Depth (ft bgs)				0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0
Matrix				SOIL	SOLID	SOIL	SOIL	SOIL	SOIL	SOIL
Dilution Factor				100	25	100	100	50	200	50
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	18.5	32.2	30	32.4	12.5	29	13.7
Aroclor-1016	NS	NS	NS	2 U	1.8 U	1.8 U	1.9 U	1.2 U	3.8 U	1.1 U
Aroclor-1221	NS	NS	NS	2 U	1.8 U	1.8 U	1.9 U	1.2 U	3.8 U	1.1 U
Aroclor-1232	NS	NS	NS	2 U	1.8 U	1.8 U	1.9 U	1.2 U	3.8 U	1.1 U
Aroclor-1242	NS	NS	NS	16	28	27	30	11	29	12
Aroclor-1248	NS	NS	NS	2 U	1.8 U	1.8 U	1.9 U	1.2 U	3.8 U	1.1 U
Aroclor-1254	NS	NS	NS	2 U	1.8 U	1.8 U	1.9 U	1.2 U	3.8 U	1.1 U
Aroclor-1260	NS	NS	NS	2.5	4.2	3	2.4	1.5	3.8 U	1.7
Aroclor-1262	NS	NS	NS	NA	1.8 U	NA	NA	NA	NA	NA
Aroclor-1268	NS	NS	NS	NA	1.8 U	NA	NA	NA	NA	NA

Notes:
NS - No NJDEP SCC for Individual PCB Aroclors
NA - Not Analyzed
U - Not Detected Above Minimum Detection Limit
P - Greater than 25% difference for detected concentrations between two GC columns.

Table 1
Summary of PCB Investigation Results
TSCA East and West Areas
BASF Corporation
Kearny, New Jersey

TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample ID				TEGRID-7-2	TEGRID-35-2	TEGRID-36-2	TEGRID-37-2	TEGRID-38-2	TEGRID-42-2	TEGRID-43-2
Laboratory ID				597286	585891	585892	585893	585894	585904	585905
Sample Date				11/01/04	11/18/04	11/18/04	11/18/04	11/18/04	11/18/04	11/18/04
Sample Depth (ft bgs)				2.0-4.0	2.0-4.0	2.0-4.0	2.0-4.0	2.0-4.0	2.0-4.0	2.0-4.0
Matrix				SOIL	SOLID	SOLID	SOLID	SOLID	SOLID	SOLID
Dilution Factor				100	25	100	50	50	10	50
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	18	34	**57**	41	38	10.6	**61.9**
Aroclor-1016	NS	NS	NS	1.9 U	1.9 U	7.8 U	3.8 U	3.6 U	0.74 U	4.6 U
Aroclor-1221	NS	NS	NS	1.9 U	1.9 U	7.8 U	3.8 U	3.6 U	0.74 U	4.6 U
Aroclor-1232	NS	NS	NS	1.9 U	1.9 U	7.8 U	3.8 U	3.6 U	0.74 U	4.6 U
Aroclor-1242	NS	NS	NS	18	31	57	41	38	0.74 U	54
Aroclor-1248	NS	NS	NS	1.9 U	1.9 U	7.8 U	3.8 U	3.6 U	9.2	4.6 U
Aroclor-1254	NS	NS	NS	1.9 U	1.9 U	7.8 U	3.8 U	3.6 U	0.74 U	4.6 U
Aroclor-1260	NS	NS	NS	1.9 U	3	7.8 U	3.8 U	3.6 U	1.4	7.9
Aroclor-1262	NS	NS	NS	NA	1.9 U	7.8 U	3.8 U	3.6 U	0.74 U	4.6 U
Aroclor-1268	NS	NS	NS	NA	1.9 U	7.8 U	3.8 U	3.6 U	0.74 U	4.6 U

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Table 1
Summary of PCB Investigation Results
TSCA East and West Areas
BASF Corporation
Kearny, New Jersey

TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	EAST	EAST	EAST	EAST	EAST	WEST	WEST
Sample ID				TEGRID-44-2	TEGRID-49-2	TEGRID-50-2	TEGRID-51-2	TEGRID-55-2	TWGRID-9-0	TWGRID-9-2
Laboratory ID				585906	588380	588381	588382	588386	597436	597437
Sample Date				11/18/04	11/30/04	11/30/04	11/30/04	11/30/04	11/02/04	11/02/04
Sample Depth (ft bgs)				2.0-4.0	2.0-4.0	2.0-4.0	2.0-4.0	2.0-4.0	0.0-2.0	2.0-4.0
Matrix				SOLID	SOLID	SOLID	SOLID	SOLID	SOIL	SOIL
Dilution Factor				10	10	50	20	10	100	50
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	7.8	8.2	**67**	33	9.2	28.4	17.8
Aroclor-1016	NS	NS	NS	0.7 U	0.76 U	3.7 U	1.4 U	0.76 U	1.9 U	1 U
Aroclor-1221	NS	NS	NS	0.7 U	0.76 U	3.7 U	1.4 U	0.76 U	1.9 U	1 U
Aroclor-1232	NS	NS	NS	0.7 U	0.76 U	3.7 U	1.4 U	0.76 U	1.9 U	1 U
Aroclor-1242	NS	NS	NS	0.7 U	7	67	28	8.2	24	16
Aroclor-1248	NS	NS	NS	6.3	0.76 U	3.7 U	1.4 U	0.76 U	1.9 U	1 U
Aroclor-1254	NS	NS	NS	0.7 U	0.76 U	3.7 U	1.4 U	0.76 U	1.9 U	1 U
Aroclor-1260	NS	NS	NS	1.5	1.2	3.7 U	5	1	4.4	1.8
Aroclor-1262	NS	NS	NS	0.7 U	0.76 U	3.7 U	1.4 U	0.76 U	NA	NA
Aroclor-1268	NS	NS	NS	0.7 U	0.76 U	3.7 U	1.4 U	0.76 U	NA	NA

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TSCA East and West Areas
BASF Corporation
Kearny, New Jersey

TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	WEST	WEST	WEST	WEST	WEST	WEST	WEST
Sample ID				TWGRID-10-0	TWGRID-10-2	TWGRID-11-0	TWGRID-11-2	TWGRID-12-0	TWGRID-12-2	TWGRID-13-0
Laboratory ID				597438	597439	597455	597456	597457	597458	597459
Sample Date				11/02/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04
Sample Depth (ft bgs)				0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0
Matrix				SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
Dilution Factor				200	100	200	100	300	50	200
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	**68.5**	18	45.9	21	**61**	11.2	33.8
Aroclor-1016	NS	NS	NS	4.8 U	2 U	3.7 U	2.2 U	5.4 U	0.98 U	3.6 U
Aroclor-1221	NS	NS	NS	4.8 U	2 U	3.7 U	2.2 U	5.4 U	0.98 U	3.6 U
Aroclor-1232	NS	NS	NS	4.8 U	2 U	3.7 U	2.2 U	5.4 U	0.98 U	3.6 U
Aroclor-1242	NS	NS	NS	61	18	40	21	61	10	30
Aroclor-1248	NS	NS	NS	4.8 U	2 U	3.7 U	2.2 U	5.4 U	0.98 U	3.6 U
Aroclor-1254	NS	NS	NS	4.8 U	2 U	3.7 U	2.2 U	5.4 U	0.98 U	3.6 U
Aroclor-1260	NS	NS	NS	7.5	2 U	5.9	2.2 U	5.4 U	1.2	3.8
Aroclor-1262	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA
Aroclor-1268	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA

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TSCA East and West Areas
BASF Corporation
Kearny, New Jersey

TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	WEST	WEST	WEST	WEST	WEST	WEST	WEST
Sample ID				TWGRID-13-2	TWGRID-14-0	TWGRID-14-2	TWGRID-15-0	TWGRID-15-2	TWGRID-16-0	TWGRID-16-2
Laboratory ID				597460	597461	597462	597463	597464	597465	597466
Sample Date				11/02/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04
Sample Depth (ft bgs)				2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0
Matrix				SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
Dilution Factor				100	200	200	50	100	100	500
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	26	49.6	**55.5**	20.8	23.7	29.1	**100**
Aroclor-1016	NS	NS	NS	2 U	4.7 U	4.7 U	1.1 U	2 U	2.1 U	10 U
Aroclor-1221	NS	NS	NS	2 U	4.7 U	4.7 U	1.1 U	2 U	2.1 U	10 U
Aroclor-1232	NS	NS	NS	2 U	4.7 U	4.7 U	1.1 U	2 U	2.1 U	10 U
Aroclor-1242	NS	NS	NS	23	42	46 P	18	21	26	100
Aroclor-1248	NS	NS	NS	2 U	4.7 U	4.7 U	1.1 U	2 U	2.1 U	10 U
Aroclor-1254	NS	NS	NS	2 U	4.7 U	4.7 U	1.1 U	2 U	2.1 U	10 U
Aroclor-1260	NS	NS	NS	3	7.6	9.5	2.8	2.7	3.1	10 U
Aroclor-1262	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA
Aroclor-1268	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA

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Table 1
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TSCA East and West Areas
BASF Corporation
Kearny, New Jersey

TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	WEST	WEST	WEST	WEST	WEST	WEST	WEST
Sample ID				TWGRID-16-4	TWGRID-17-0	TWGRID-17-2	TWGRID-18-0	TWGRID-18-2	TWGRID-19-0	TWGRID-19-2
Laboratory ID				585895	597467	597468	597469	597470	597471	597472
Sample Date				11/18/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04
Sample Depth (ft bgs)				4.0-6.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0
Matrix				SOLID	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
Dilution Factor				2	200	500	100	100	50	300
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	2.91	42.1	**93**	28.2	29.9	21	**81**
Aroclor-1016	NS	NS	NS	0.17 U	3.7 U	12 U	1.8 U	2 U	1.2 U	6.5 U
Aroclor-1221	NS	NS	NS	0.17 U	3.7 U	12 U	1.8 U	2 U	1.2 U	6.5 U
Aroclor-1232	NS	NS	NS	0.17 U	3.7 U	12 U	1.8 U	2 U	1.2 U	6.5 U
Aroclor-1242	NS	NS	NS	2.6	36 P	93 P	21	23 P	16	6.5 U
Aroclor-1248	NS	NS	NS	0.17 U	3.7 U	12 U	1.8 U	2 U	1.2 U	66
Aroclor-1254	NS	NS	NS	0.17 U	3.7 U	12 U	1.8 U	2 U	1.2 U	6.5 U
Aroclor-1260	NS	NS	NS	0.31	6.1	12 U	7.2	6.9	5	15
Aroclor-1262	NS	NS	NS	0.17 U	NA	NA	NA	NA	NA	NA
Aroclor-1268	NS	NS	NS	0.17 U	NA	NA	NA	NA	NA	NA

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TSCA Area	New Jersey Residential Direct Contact Soil Cleanup Criteria	New Jersey Non-Residential Direct Contact Soil Cleanup Criteria	New Jersey Impact to Ground Water Soil Cleanup Criteria	WEST	WEST	WEST	WEST	WEST	WEST	WEST
Sample ID				TWGRID-20-0	TWGRID-20-2	TWGRID-21-0	TWGRID-21-2	TWGRID-22-0	TWGRID-22-2	TWGRID-23-0
Laboratory ID				597473	597474	598031	597511	597512	597513	597514
Sample Date				11/02/04	11/02/04	11/2/2004	11/02/04	11/02/04	11/02/04	11/02/04
Sample Depth (ft bgs)				0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0
Matrix				SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
Dilution Factor				50	200	100	100	100	100	100
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	9.9	43.6	21.9	19.4	22.2	12.5	17.1
Aroclor-1016	NS	NS	NS	0.89 U	4.4 U	1.9 U	2 U	1.9 U	1.8 U	1.8 U
Aroclor-1221	NS	NS	NS	0.89 U	4.4 U	1.9 U	2 U	1.9 U	1.8 U	1.8 U
Aroclor-1232	NS	NS	NS	0.89 U	4.4 U	1.9 U	2 U	1.9 U	1.8 U	1.8 U
Aroclor-1242	NS	NS	NS	8.1	38 P	18 P	16 P	17 P	9 P	11 P
Aroclor-1248	NS	NS	NS	0.89 U	4.4 U	1.9 U	2 U	1.9 U	1.8 U	1.8 U
Aroclor-1254	NS	NS	NS	0.89 U	4.4 U	1.9 U	2 U	1.9 U	1.8 U	1.8 U
Aroclor-1260	NS	NS	NS	1.8	5.6	3.9	3.4	5.2	3.5	6.1
Aroclor-1262	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA
Aroclor-1268	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA

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Sample ID				TWGRID-23-2	TWGRID-24-0	TWGRID-24-2	TWGRID-25-0	TWGRID-25-2	TWGRID-26-0	TWGRID-26-2
Laboratory ID				597515	597516	597517	597518	597519	597520	597521
Sample Date				11/02/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04	11/02/04
Sample Depth (ft bgs)				2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0
Matrix				SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
Dilution Factor				100	50	50	300	100	50	25
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	19.1	11.6	7.8	**79**	16.3	9.5	4.3
Aroclor-1016	NS	NS	NS	2 U	0.92 U	1 U	5.5 U	2 U	0.9 U	0.48 U
Aroclor-1221	NS	NS	NS	2 U	0.92 U	1 U	5.5 U	2 U	0.9 U	0.48 U
Aroclor-1232	NS	NS	NS	2 U	0.92 U	1 U	5.5 U	2 U	0.9 U	0.48 U
Aroclor-1242	NS	NS	NS	13 P	9.2 P	5.7 P	5.5 U	12 P	7.1 P	3.1 P
Aroclor-1248	NS	NS	NS	2 U	0.92 U	1 U	57 P	2 U	0.9 U	0.48 U
Aroclor-1254	NS	NS	NS	2 U	0.92 U	1 U	5.5 U	2 U	0.9 U	0.48 U
Aroclor-1260	NS	NS	NS	6.1	2.4	2.1	22	4.3	2.4	1.2
Aroclor-1262	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA
Aroclor-1268	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA

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Sample ID				TWGRID-27-0	TWGRID-27-2	TWGRID-28-0	TWGRID-28-2	TWGRID-30-2	TWGRID-31-2
Laboratory ID				597522	597523	597524	597525	585896	585897
Sample Date				11/02/04	11/02/04	11/02/04	11/02/04	11/18/04	11/18/04
Sample Depth (ft bgs)				0.0-2.0	2.0-4.0	0.0-2.0	2.0-4.0	2.0-4.0	2.0-4.0
Matrix				SOIL	SOIL	SOIL	SOIL	SOLID	SOLID
Dilution Factor				50	50	25	10	25	50
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Total PCBs	0.49	2	50	8.1	8.4	4.2	2.37	29.6	**56.6**
Aroclor-1016	NS	NS	NS	0.88 U	0.95 U	0.46 U	0.22 U	2 U	3.9 U
Aroclor-1221	NS	NS	NS	0.88 U	0.95 U	0.46 U	0.22 U	2 U	3.9 U
Aroclor-1232	NS	NS	NS	0.88 U	0.95 U	0.46 U	0.22 U	2 U	3.9 U
Aroclor-1242	NS	NS	NS	6.7 P	7 P	3 P	1.7 P	24	47
Aroclor-1248	NS	NS	NS	0.88 U	0.95 U	0.46 U	0.22 U	2 U	3.9 U
Aroclor-1254	NS	NS	NS	0.88 U	0.95 U	0.46 U	0.22 U	2 U	3.6 U
Aroclor-1260	NS	NS	NS	1.4	1.4	1.2	0.67	5.6	9.6
Aroclor-1262	NS	NS	NS	NA	NA	NA	NA	2 U	3.9 U
Aroclor-1268	NS	NS	NS	NA	NA	NA	NA	2 U	3.9 U

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